

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ANN MITCHELL,
Plaintiff,**

v.

**HALLMARK HEALTH SYSTEM, INC./
LAWRENCE MEMORIAL HOSPITAL
and JULIE CHASE SHAUGHNESSY,
Defendants.**

Civil Action No. 04-cv-12169-REK

JOINT MOTION TO AMEND SCHEDULING ORDER

The Parties hereby jointly move this Honorable Court to amend the Scheduling Order in this case to:

- (1) schedule hearings on motions, including motions to compel, for the same time as the next status conference which is scheduled for December 14, 2005,
- (2) extend the discovery period to February 1, 2006,
- (3) extend the period for service of Rule 56 Motions to March 15, 2006,
- (4) extend the period for filing oppositions to summary judgment motions to and including April 28, 2006,
- (5) schedule the Final Pretrial Conference and Trial of this matter on dates convenient to the Court and the parties.

As grounds for this Motion, the parties state as follows:

1. Under the present Scheduling Order, discovery in this matter is to completed by November 23, 2005.
2. The parties are in the midst of discovery and need additional time to try to resolve various discovery disputes that have arisen, file motions to compel as necessary, and complete exchanging written discovery responses and taking depositions. The parties agree that the

additional time requested will allow them to conclude the discovery process in a reasonable, fair and just manner.

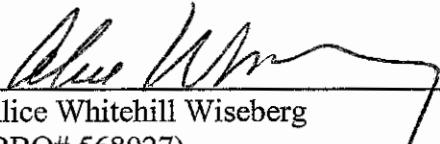
3. The pending litigation schedules of the parties' respective counsel require the additional time sought in which to complete discovery.

For the foregoing reasons, the parties respectfully request that this Court ALLOW the parties joint motion.

Respectfully submitted,

ANN MITCHELL

By her attorney,



Alice Whitehill Wiseberg
(BBO# 568027)
65A Atlantic Avenue
Boston , MA 02110
(617) 304-3848

Dated: November 9, 2005

HALLMARK HEALTH SYSTEM, INC./
LAWRENCE MEMORIAL HOSPITAL
and JULIE CHASE SHAUGHNESSY

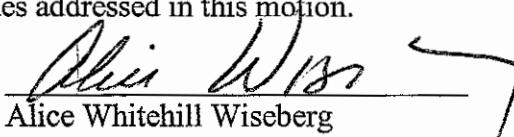
By their attorneys,



Macon P. Magee (BBO #550602)
John M. Simon (BBO# 645557)
Stoneman, Chandler & Miller, LLP
99 High Street
Boston, MA 02110
(617) 542-6789

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1 (A)(2)

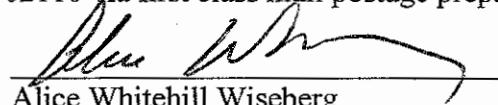
I, Alice Whitehill Wiseberg, Esq., hereby certify that counsel has conferred and have attempted in good faith to resolve or narrow the issues addressed in this motion.



Alice Whitehill Wiseberg

CERTIFICATE OF SERVICE

I, Alice Whitehill Wiseberg, Esq. Hereby certify that on this the 10th day of November I served a true copy of the above motion on counsel for Defendants John Simon, Esq., Stoneman, Chandler & Miller, LLP, 99 High Street, Boston, MA 02110 via first class mail postage prepaid.



Alice Whitehill Wiseberg